

Exhibit 19

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION

4 IN RE: NATIONAL)
5 PRESCRIPTION) MDL No. 2804
6 OPIATE LITIGATION)
7 _____) Case No.
8) 1:17-MD-2804
9 THIS DOCUMENT RELATES) Hon. Dan A.
10 TO ALL CASES) Polster

11 TUESDAY, JANUARY 8, 2019

12 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
13 CONFIDENTIALITY REVIEW
14 - - -

15 Videotaped deposition of Ginger
16 Collier, held at the offices of STINSON
17 LEONARD STREET LLP, 7700 Forsyth Boulevard,
18 Suite 1000, St. Louis, Missouri, commencing
19 at 9:10 a.m., on the above date, before
20 Carrie A. Campbell, Registered Diplomate
21 Reporter and Certified Realtime Reporter.

22 - - -
23
24 GOLKOW LITIGATION SERVICES
25 877.370.3377 ph | 917.591.5672 fax
 deps@golkow.com

1	MR. O'CONNOR: Object to form.	15:27:53
2	THE WITNESS: I don't remember.	15:27:54
3	QUESTIONS BY MR. GOTTO:	15:27:55
4	Q. Okay. Do you know what opioid	15:27:55
5	rotation means in the context of this mailer?	15:27:57
6	A. No, I do not.	15:28:00
7	Q. Okay. And down toward the	15:28:02
8	bottom of the mailer it says, "This activity	15:28:04
9	is funded through an educational grant from	15:28:06
10	Mallinckrodt/Covidien."	15:28:11
11	Do you see that?	15:28:12
12	A. Yes.	15:28:13
13	Q. And educational grants of that	15:28:13
14	type, is that something that was handled by	15:28:17
15	the marketing department?	15:28:20
16	A. Not in my group, because this	15:28:21
17	is targeting physicians. We don't target	15:28:25
18	physicians at all. We don't even talk to	15:28:27
19	them.	15:28:29
20	Q. Okay. So whatever educational	15:28:29
21	grant underlay this presentation would have	15:28:33
22	been something that someone else handled?	15:28:35
23	A. Correct.	15:28:37
24	Q. Okay. All right. You can set	15:28:37
25	that aside.	15:28:41